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Hon. Brian D. Lynch
Chapter 7
Hearing date: Wed., Jan. 15, 2020
at 9:00 a.m.
Response date: 1/8/20

IN THE UNITED STATES BANKRUPTCY COURT FOR THE WESTERN
DISTRICT OF WASHINGTON AT TACOMA

In re:

GREGORY R. DUCHARME, KIMBERLY D.
DUCHARME,
Debtors.

NO. 19-43703-BDL

MOTION OF SECURED CREDITOR
MOUNTAIN AMERICA CREDIT UNION
FOR RELIEF FROM AUTOMATIC STAY

COMES NOW Mountain America Credit Union by and through its attorneys,
Siderius, Lonergan & Martin, LLP, and moves the court for relief from the automatic stay
provisions of 11 USC § 362. Said secured creditor holds a perfected security in a 2018
Keystone Hideout RV automobile. Secured creditor Mountain America Credit Union
requests relief from the stay to allow repossession of said vehicle. Secured party also
requests waiver of the provisions of BR 4001 (a)(3) so that it may forthwith commence or
continue repossession through appropriate legal channels. The factual basis for this
motion is set forth in the declaration submitted herewith.

DATED this 12th day of December, 2019.

/s/ Michael Siderius
Michael Siderius, of
SIDERIUS, LONERGAN & MARTIN, LLP
Attorney for Mountain America Credit Union
WSBA #25510